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UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

JOSHUA RICE	PLAINTIFF(S)	CASE NUMBER
v.		CV09-9432 SJO (RCx)
CITY OF BELL GARDENS,	DEFENDANT(S).	ADR PILOT PROGRAM QUESTIONNAIRE

(1) What, if any, discovery do the parties believe is essential in order to prepare adequately for a settlement conference or mediation? Please outline with specificity the type(s) of discovery and proposed completion date(s). Please outline any areas of disagreement in this regard. Your designations do not limit the discovery that you will be able to take in the event this case does not settle.

The parties believe the following discovery is necessary:  
depositions of Plaintiffs, the involved officers and any witnesses;  
production of documents including officer personnel files,  
City policies, investigation/use of force reports and any recorded  
statements of officers and witnesses.

(2) What are the damage amounts being claimed by each plaintiff? Identify the categories of damage claimed [e.g., lost profits, medical expenses (past and future), lost wages (past and future), emotional distress, damage to reputation, etc.] and the portion of the total damages claimed attributed to each category.

Plaintiff Joshua Rice claims compensatory damages, punitive damages, medical expenses, emotional distress and lost wages.  
Plaintiff will be better suited to determine the approximate amount of each category of damages after some discovery.

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(3) Do the parties agree to utilize a private mediator in lieu of the court's ADR Pilot Program?

Yes  No

(4) If this case is in category civil rights - employment (442), check all boxes that describe the legal bases of plaintiff claim(s).

Title VII

Age Discrimination

42 U.S.C. section 1983

California Fair Employment and Housing Act

Americans with Disabilities Act of 1990

Rehabilitation Act

Other \_\_\_\_\_

I hereby certify that all parties have discussed and agree that the above-mentioned responses are true and correct.

April 29, 2010  
Date

Melanie T. Partow  
Attorney for Plaintiff (Signature)

Melanie T. Partow

Attorney for Plaintiff (Please print full name)

April 12/10  
Date

Heidi  
Attorney for Defendant (Signature)

Glen E. Tucker

Attorney for Defendant (Please print full name)